

Jared R. Richards, Esq.
Nevada Bar No. 11254
Dustin E. Birch, Esq.
Nevada Bar No. 10517
CLEAR COUNSEL LAW GROUP
1671 W. Horizon Ridge Pkwy, Suite 200
Henderson, Nevada 89102
Telephone No.: (702) 476-5900
Facsimile No.: (702) 924-0709
jared@clearcounsel.com
dustin@clearcounsel.com
Attorneys for Plaintiff
Alejandro Rosales

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ALEJANDRO ROSALES, individually

Plaintiff,

vs.

OFFICER BELL-BRANDZ, OFFICER
MCCARY; OFFICER PELAYO; OFFICER
GARCIA; OFFICER VON GOLDBERG;
OFFICER BUTIN; OFFICER DEMARINIS;
and DOE OFFICERS I - XX.,

Defendants.

CASE NO.: 2:21-cv-01973-JCM-BNW

**STIPULATION AND ORDER TO EXTEND
PLAINTIFF'S OPPOSITIONS TO LVMPD
DEFENDANTS' MOTION TO DISMISS
FOR FAILURE TO PROSECUTE, OR
ALTERNATIVELY, MOTION FOR
JUDGMENT ON THE PLEADINGS**

(FIRST REQUEST)

COMES NOW, Plaintiff, Alejandro Rosales, by and through his attorneys of record, Jared R. Richards, Esq. and Dustin E. Birch, Esq. of Clear Counsel Law Group, and Defendants, Officer Bell-Brandez, Officer McCary, Officer Pelayo, Officer Garcia, Officer Von Goldberg, Officer Butin, and Officer Demarinis, collectively ("LVMPD Defendants"), by and through their counsel of record, Craig Anderson, Esq. of Marquis Aurbach hereby agree and jointly stipulate the following.

1. LVMPD Defendants filed their Motion to Dismiss for Failure to Prosecute, or

alternatively, Motion for Judgment on the Pleadings on July 31, 2024 [EFC No. 50 and 51];

2. Plaintiff's counsel has been sick and needs additional time to properly respond and is unable to meet the deadline of August 14, 2024 currently scheduled for Plaintiff's Opposition to Defendants Motion to Dismiss for Failure to Prosecute, or alternatively, Motion for Judgment on the Pleadings;

3. The Parties have agreed to a seven (7) day extension for Plaintiff's Opposition to Defendants Motion to Dismiss for Failure to Prosecute, or alternatively, Motion for Judgment on the Pleadings;

4. Accordingly, the deadline for Plaintiff's Opposition to Defendants Motion to Dismiss for Failure to Prosecute, or alternatively, Motion for Judgment on the Pleadings, currently due on August 14, 2024, be extended to and including Wednesday, August 21, 2024;

5. This is the Parties' first request to extend the deadline to Plaintiff's Opposition to Defendants Motion to Dismiss for Failure to Prosecute, or alternatively, Motion for Judgment on the Pleadings; and

6. This Stipulation is being entered in good faith and not for purposes of delay.

IT IS SO STIPULATED.

Dated this 12th day of August, 2024.

CLEAR COUNSEL LAW GROUP

/s/ Dustin E. Birch

Jared Richard, Esq.
Nevada Bar No. 11254
Dustin E. Birch, Esq.
Nevada Bar No. 10517
1671 W. Horizon Ridge Pkwy, Suite 200
Henderson, NV 89012
Attorneys for Plaintiff Alejandro Rosales

Dated this 12th day of August, 2024.

MARQUIS AURBACH

/s/ Criag R. Anderson

Craig R. Anderson, Esq.
Nevada Bar No. 6882
10001 Park Run Drive
Las Vegas, Nevada 89145
*Attorneys for Defendants Officer Bell-
Brandez, Officer McCary, Officer Pelayo,
Officer Garcia, Officer Von Goldberg, Officer
Butin, Officer Demarinis*

ORDER

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: August 14, 2024